

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network :
Rationalization Service : Docket No. N2012-1
Changes, 2012 :

GREETING CARD ASSOCIATION FOLLOWUP INTERROGATORIES TO
POSTAL SERVICE WITNESS ROSENBERG

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, the Greeting Card Association herewith submits interrogatories and requests for production of documents; specifically:

Followup interrogatories to Postal Service witness Rosenberg:

GCA/USPS-T3-40 to -50

These followup interrogatories address witness Rosenberg's responses, filed February 28, 2012, to certain GCA interrogatories filed February 8, 2012. The term "documents" includes, without limitation, letters, telegrams, memoranda, reports, studies, articles from periodicals, speeches, testimonies, books, pamphlets, tabulations, and workpapers. In terms of format, "documents" includes written or printed records and disks, tapes, or other recorded media (together with such written material as is necessary to understand and use such disks, tapes, or other media).

March 6, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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GCA/USPS-T3-40

In your answer to GCA/USPS-T3-8(b), you state that “The scoring tool includes a subset of the iterations run.” You also note that “no document that includes all iterations”. For the subset of the iterations run, please answer the question as specified in the last two sentences of (b).

GCA/USPS-T3-41

In your answer to GCA/USPS-T3- 9. (c), you state that it was realized "that mailers may be able to enter prior to the initiation of DPS processing[.]" To clarify your response, please answer the following questions.

(a) Please confirm that in the clause quoted above, "mailers" refers only to Presort mailers. If you do not confirm, please explain the scope of the term "mailers" as you used it in your answer.

(b) Did the feedback and comments referred to in your response include any views or discussion of Single-Piece mail? If so, please describe any such views or discussion of which you are aware.

(c) If your answer to (a) was to confirm that Presort mailers are considered able to enter prior to initiation of DPS processing, please explain why collection mail, such as local mail, could not be entered at a similar time, for example by adjusting pickup times as necessary?

(d) If Presort bureaus can pick up and sort collection mail as well as bulk mail on Monday and submit it to USPS on Monday prior to initiation of DPS processing, why could not the Postal Service deal similarly with collection mail under the proposed plan?

GCA/USPS-T3-42

(a) With respect to your answer to GCA/USPS-T3-10, are all such potential future locations taken from existing locations, or are some nodes entirely new proposed locations?

(b) If your answer in (a) states there are no new nodes, please explain why approximately the surviving half of an old network built for a different set of circumstances can “optimize” the Postal Service’s needs for the future.

GCA/USPS-T3-43

The correct citation for GCA/USPS-T3-11 is your testimony at page 3, line 20. With correction of the page number, please answer both questions in that interrogatory.

GCA/USPS-T3-44

In GCA/USPS-T3-12 (c) and (d), the intent of the questions was to postulate a service standard change *only* for the late-arriving mail, with other mail being handled under the current standard. Your answers appear to assume that the question postulated no service standard change for any mail. With this clarification in mind, please answer questions (c) and (d), or redirect the question to an appropriate witness.

GCA/USPS-T3-45

The correct reference for the questions posed in GCA/USPS-T3-16 is LR 14_REP, Excel File 14_mail processing window scoring tool. There is no page number for the page in question, but there is an explanatory paragraph at the top of the page which begins: “When generating results, the tool calculates savings

one scenario at a time.” With this clarification in mind, please answer the three parts of this question.

GCA/USPS-T3-46

The correct reference for the questions posed in GCA/USPS-T3-20 - 23 is LR 14_REP, Excel File 14_mail processing window scoring tool. There is no page number for the page in question, but there is an explanatory paragraph at the top of the page which begins: “When generating results, the tool calculates savings one scenario at a time.” With this clarification in mind, please answer the four cited interrogatories.

GCA/USPS-T3-47

Please refer to your response to GCA/USPS-T3-27. At any time in the planning for, and development of your scoring model:

(a) Were you asked to develop or did you intend to develop a scoring model which did rank costs of various network scenarios?

(b) If your answer to (a) is other than an unequivocal “no”,

(i) was there a point in the development of your scoring tool when you or your team recognized that its output would be more limited than envisioned when it came to comparing costs?

(ii) if your answer to (b)(i) is affirmative in any degree, please explain at what point in the development of the scoring tool this was recognized.

GCA/USPS-T3-48

The reference for the second sentence of GCA/USPS-T3-34 is LR 14_REP, Excel File 14,_mail processing window scoring tool. There is no page number for the page in question, but there is an explanatory paragraph at the top of the page which begins: "When generating results, the tool calculates savings one scenario at a time." With this corrected citation, please answer the question.

GCA/USPS-T3-49

Please refer to your answer to GCA/USPS-T3-36., specifically the first two items listed on your six point binary scale.

(a) Please confirm that your usage of the term "service standard" means the current service standard. If you do not confirm, please explain your usage of "service standard."

(b) Please confirm that if 99 percent of the single- piece mail met the current service standards for the first two items on your six point binary scale, and only 1 percent did not, the network scenario envisioned would in essence be deemed infeasible for 100 percent of that mail.

(c) Please assume, hypothetically, that service standards were changed so that all mail meeting the criteria of the first two items on your scale (the 99 percent referenced in (b)), would be processed using current service standards, and the 1 percent would be processed for delivery a day later using an additional, modified standard for it. Please confirm that under such an assumption a number of the new networks that were deemed infeasible under your assumptions, would then be deemed feasible. If you do not confirm, please explain.

(d) Assuming the service changes proposed in (c), please confirm that there would be a number of feasible new networks that did not eliminate overnight delivery for all single – piece FCLM. If you do not confirm, please explain.

(e) Assuming the service changes proposed in (c), please confirm that there would be a number of feasible new networks with less mail processing equipment and facilities than at present. If you do not confirm, please explain.

GCA/USPS-T3-50

Please refer to your response to GCA/USPS-T3-38. Your answer appears to be based on the restrictive assumption that current service standards can be compared with only one type of change in service standards, namely an end to overnight delivery for all single -piece FCLM. Please assume a change in service standards as in the preceding interrogatory, GCA/USPS-T3-49, rather than elimination of overnight delivery for all single- piece FCLM, regardless of when it was entered into the system. Using this rather than the assumption that apparently governs your answer, please answer the question.